

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

NICOLE PFUND,  
aka Kelly Lasey, Jamie Hart, Stacey Monty,  
Dana Eisenhower, Tabitha Rastelli, and  
Diane Costello,  
  
Defendant.

Criminal Action No. 06- 23-UNA

MOTION FOR DETENTION HEARING

NOW COMES the United States and moves for the pretrial detention of the defendant, Nicole Pfund, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156)  
☐ Maximum sentence life imprisonment or death  
☐ 10+ year drug offense  
☐ Felony, with two prior convictions in above categories  
☒ Serious risk defendant will flee  
☐ Serious risk obstruction of justice

2. Reason For Detention. The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- ☒ Defendant's appearance as required  
☐ Safety of any other person and the community



3. **Rebuttable Presumption**. The United States will not invoke the rebuttable presumption against defendant under § 3142(e). The presumption applies because (**check one or both**):

\_\_\_\_\_ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

\_\_\_\_\_ Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing**. The United States requests the court conduct the detention hearing,

\_\_\_\_\_ At first appearance

  X   After continuance of   3   days (not more than 3).

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

BY:

  
Shannon Thee Hansen  
Assistant United States Attorney

Date: March 17, 2006